

Message

From: Minter, Douglas [Minter.Douglas@epa.gov]
Sent: 1/24/2020 8:36:19 PM
To: Bahrman, Sarah [Bahrman.Sarah@epa.gov]; Robinson, Valois [Robinson.Valois@epa.gov]
Subject: RE: my updated list

Thanks.

Actually, I think the bullet on getting help on the CEA and EJ is more specific and captures the idea of collateral duty. How about I delete the latter?

From: Bahrman, Sarah <Bahrman.Sarah@epa.gov>
Sent: Friday, January 24, 2020 1:31 PM
To: Minter, Douglas <Minter.Douglas@epa.gov>; Robinson, Valois <Robinson.Valois@epa.gov>
Subject: RE: my updated list

Thanks – I have a call at 1:30 but made some edits to the first set of bullets that I wanted to share. All editorial.

On the second set – what do you have in mind for someone on a collateral duty assignment to work on? We should have a clear idea in mind before we propose.

I'll look at the attachment after my call, which ends at 2

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From: Minter, Douglas <Minter.Douglas@epa.gov>
Sent: Friday, January 24, 2020 1:18 PM
To: Robinson, Valois <Robinson.Valois@epa.gov>; Bahrman, Sarah <Bahrman.Sarah@epa.gov>
Subject: FW: my updated list

Thanks Valois: my only edit was to insert a date for the document at the top.

Sarah: let us know if you have comments, etc. on this document and I will attach it to the invite for Monday.

Sarah/Valois: below is a revised set of the two lists that I will insert into the invite. Let me know if you any edits, etc.

Darcy: immediately below is an outline of the nature/scope of outstanding work for Dewey Burdock Final UIC Permit Issuance. The attached document proposes a detailed timeline (by month) which we believe is aggressive but still realistic.

Scope of Remaining Major Tasks:

- *Review significant public comments to identify further changes to permits (VR/RA Lead).*
- **Ex. 5 Deliberative Process (DP)**
- *Modify draft permits, and aquifer exemption ROD and supporting documents based on comments received (VR: Class III/AE Lead & RA: Class V Lead).*
- *Update Cumulative Effects Analysis (CEA) in response to comments (Lead TBD)*
- *Update Environment Justice Document in response to comments (Lead TBD)*

- *Update Biological Assessment for ESA Compliance (OS-L Lead)*
- *RA Approval of Waiver for use of PVC well casing for the Class III wells (BS Lead)*
- *Review/Revise Response to Comments document prepared by Cadmus (VR/DM/OSL/RA/LC Co-Leads)*
- *Finalize our plan for compliance with NHPA and document effort (VR/MB Co-Leads)*
- *Finalize our tribal consultation process, including the response documents for each tribe describing how we took their concerns and comments into consideration (OS-L Lead).*
- *Compile/Organize/Index the administrative record (Paralegal and/or Student Volunteer Lead).*
- *Financial Assurance review of Powertech's surety bond or other financial instruments (BD Lead)*
- *HQs/Region 8 senior management/RA briefings (DM Lead)*

This second set of bullets is offered to facilitate further brainstorming on how we may bring more resources to this effort.

Options for Procuring Additional Resources for Final UIC Permit Issuance:

- *Student Volunteer (Document Management and/or Administrative Record)*
- *Paralegal (Administrative Record)*
- *Increased FTE investment within UIC Section (Omar, Douglas, Bruce, and vice-Sierra Lopez hire?)*
- *Postpone other UIC Section commitments (e.g., permit renewals and legacy permits)*
- *Delegate other UIC work to non-DB Team Members within Section (e.g., WOGCC AE backlog)*
- *Solicit collateral duty from in/outside Water Division*
- *Increase HQ funding of Cadmus contract hours for RTC, tribal consultation, and Class III technical support*
- *Recruit support on EJ and CEA from outside UIC Section*
- *Other ideas ??*

Douglas

From: Robinson, Valois <Robinson.Valois@epa.gov>
Sent: Friday, January 24, 2020 12:29 PM
To: Minter, Douglas <Minter.Douglas@epa.gov>
Subject: RE: my updated list

Here is my updated list.
 Thanks for looking it over.

Valois

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From: Minter, Douglas <Minter.Douglas@epa.gov>
Sent: Friday, January 24, 2020 11:42 AM
To: Robinson, Valois <Robinson.Valois@epa.gov>
Subject: RE: Additions to your bullet list

Thanks: I will send an updated list with names, etc. to you and Sarah next.

Happy to review an updated version of your timeline document. I'm glad Sarah agreed to share this with Darcy.

From: Robinson, Valois <Robinson.Valois@epa.gov>

Sent: Friday, January 24, 2020 11:33 AM

To: Minter, Douglas <Minter.Douglas@epa.gov>

Subject: Additions to your bullet list

- *Review significant/relevant public comments from the second public comment period to ensure Cadmus' Response to Comments document is adequate.*
- *Modify the draft permits, aquifer exemption, and supporting documents (CEA, EJ, maybe ESA) as needed based on comments received.*
- *Review/Revise Response to Comments document prepared by Cadmus. (note: we made need to ask Azarga for assistance to obtain information to needed for some of the responses.)*
- *Finalize our plan for compliance with NHPA and document that effort*
- *Finalize our tribal consultation process, including the response documents for each tribe describing how we took their concerns and comments into consideration.*
- *Finalize the administrative record and index.*

Ex. 5 Deliberative Process (DP)

- *Financial Assurance review once Powertech submits the FR package*
- **Ex. 5 Deliberative Process (DP)**
- *HQ and Region 8 manager briefings*
- *RA approval of waiver for use of PVC well casing for the Class III wells*
- *RA Briefings*

Valois

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